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3 **UNITED STATES DISTRICT COURT**
4 **DISTRICT OF MASSACHUSETTS**
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6 _____)
7 **IN RE BIOPURE CORPORATION SECURITIES**)
8 **LITIGATION**)
9 _____)

CIVIL ACTION
NO. 03-12628-NG

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11 **AFFIDAVIT OF RONALD ERICKSON**
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13 I, Ronald Erickson, depose and say as follows:

14 1. My name is Ronald Erickson. By order of this Court dated May 14, 2004, I was
15 appointed the Lead Plaintiff in this action.
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17 2. I lost approximately \$243,000 on purchases of common shares of Biopure
18 Corporation, Inc. ("Biopure") during the Class Period of April; 9, 2003 through December 24,
19 2003 in this action.
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21 4. I funded my purchases of Biopure common shares during the Class Period from
22 money from funds available in my 401(k) plan at Washington Mutual Bank or with cash
23 generated from the exercise of my Washington Mutual Bank stock options and sales of
24 underlying shares related to such options. After learning on or about December 24, 2003 of
25 significant declines in the value of my Biopure shares and the FDA's halting of Biopure clinical
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1 trauma trials for Hemopure, I contacted one of my attorneys, Howard T. Longman of Stull,
2 Stull & Brody.

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4 5. I have performed the following tasks as lead plaintiff in this litigation:

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6 a. had initial consultation with counsel;

7 b. reviewed the complaint filed in this action and study and reviewed plaintiff's
8 certification;

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10 c. reviewed pleadings related to the lead plaintiff contest;

11 d. attended a hearing before this Court on Plaintiffs' motions for consolidation,
12 appointment of lead plaintiff and appointment of lead plaintiff's choice of counsel;

13 e. studied and approved the Consolidated Amended Complaint and the
14 Second Consolidated Amended Complaint;

15 f. reviewed and discussed with counsel legal issues related to Defendants'
16 motions to dismiss;

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18 g. made calls to or took calls from my counsel to discuss the status of case;

19 h. assembled documents for production to Defendants in connection with class
20 certification motion and reviewed interrogatory responses;

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22 i. prepared for my deposition with my counsel;

23 j. testified at deposition in response to Defendants' counsels' questioning; and

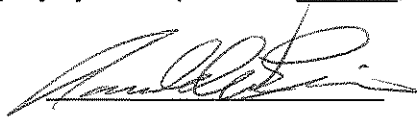
24
25 k. conferred with my counsel regarding the settlement of this action.

26 6. I estimate that I have devoted at least 25 hours to this litigation, and probably even
27 more. From inception of this litigation through October 2004, I was employed as a Regional
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1 Vice President and Regional Sales Manager by Washington Mutual Savings Bank. There, I
2 earned approximately \$30,000 monthly, based largely on commissions. From October 2004
3 through January 2006, I worked as a Regional Vice President and Regional Sales Manager at
4 American Home Mortgage. At American Home Mortgage I earned approximately \$50,000 per
5 month, also based on mortgage sales commissions. From May 1, 2006 until January 31, 2007
6 I was employed at Wells Fargo bank as an area manager and made approximately \$37,500
7 per month, also based on commissions. At all of these banks I was responsible for sales of
8 residential mortgage products.
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11 7. As a result of my devoting time to this litigation as described above, which took time
12 away from my employment. I estimate I lost approximately \$5,850.00 in commission income
13 that I would otherwise have earned.
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15 Signed under the penalties of perjury on September 5, 2007.
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